

Steven J. Luckner
Jennifer Rygiel-Boyd
**OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.**
10 Madison Avenue, Suite 400
Morristown, New Jersey 07960
Telephone: (973) 656-1600
Facsimile: (973) 656-1611
*Attorneys for Defendant Liberty Mutual
Insurance Company*

-----	:	Hon. Madeline Cox Arelo, U.S.D.J.
LATOYA THOMPSON,	:	Case No.: 2:18-cv-06092-MCA-JAD
	:	
Plaintiff,	:	
	:	NOTICE OF MOTION FOR
v.	:	SUMMARY JUDGMENT
	:	
LIBERTY MUTUAL INSURANCE,	:	
	:	
Defendant.	:	
-----	:	

TO: Brian M. Cige, Esq.
Law Offices of Brian M. Cige
7 East High Street
Somerville, New Jersey 08876
Attorneys for Plaintiff Latoya Thopson

PLEASE TAKE NOTICE that on September 4, 2020, or as soon as counsel may be heard, Defendant Liberty Mutual Insurance (“Defendant”) will move before The Honorable Madeline Cox Arleo, U.S.D.J. of this Court located at Martin Luther King Fed. Bldg. & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting it summary judgment and dismissing Plaintiff Latoya Thompson’s (“Plaintiff”) Complaint with prejudice.

PLEASE TAKE FURTHER NOTICE that, in support of this motion, Defendant relies upon the concurrently submitted Memorandum of Law and Certification of Jennifer Rygiel-Boyd with exhibits.

A Separate Statement of Undisputed Facts is submitted in accordance with Local Rule 56.1(a).

A proposed Order is submitted in accordance with Local Rule 7.1(e).

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's Order dated June 9, 2020 (Docket Entry No. 51), Defendant serves its motion papers today and will file its motion papers, along with its reply papers, on or before September 4, 2020.

PLEASE TAKE FURTHER NOTICE that Defendant requests oral argument.

Respectfully submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
Attorneys for Defendant Liberty Mutual
Insurance Co.

By: s/ Jennifer Rygiel-Boyd
Jennifer Rygiel-Boyd

Date: July 7, 2020

•
•
• 43409060.1